

**BEFORE THE  
STATE OF CALIFORNIA  
ENERGY RESOURCES CONSERVATION  
AND DEVELOPMENT COMMISSION**

<b>In the Matter of:</b>	)	<b>Docket 03-CRS-01</b>
<b>Proposed Rulemaking Pertaining to</b>	)	
<b>Data Collection for Qualified Departing</b>	)	
<b>Load CRS Exemptions</b>	)	
<hr/>	)	

**COMMENTS OF OAK CREEK ENERGY SYSTEMS  
ON PROPOSED APPLICATION FORM**

Harold M. Romanowitz  
Oak Creek Energy Systems, Inc.  
14633 Willow Springs Road  
Mojave, CA 93501  
661-822-6853 voice  
661-822-5991 fax  
[hal@rwitz.net](mailto:hal@rwitz.net)

November 26, 2003

**BEFORE THE  
STATE OF CALIFORNIA**

**ENERGY RESOURCES CONSERVATION  
AND DEVELOPMENT COMMISSION**

<b>In the Matter of:</b>	)	<b>Docket 03-CRS-01</b>
<b>Proposed Rulemaking Pertaining to</b>	)	
<b>Data Collection for Qualified Departing</b>	)	
<b>Load CRS Exemptions</b>	)	
_____	)	

**COMMENTS OF OAK CREEK ENERGY SYSTEMS  
ON PROPOSED APPLICATION FORM**

Pursuant to the California Energy Commission (Commission) directive in the cover e-mail, Oak Creek Energy Systems, Inc. submits these comments on the Application for Customer Generation Cost Responsibility Surcharge Tariff Exemption ("Proposed Form") distributed on November 10, 2003. Oak Creek Energy appreciates the clear and thoughtful effort put forth by the Commission in creating the Proposed Form.

**1. Part 3 of the Proposed Form, "Number of Generators of this type" block.**

Oak Creek appreciates the addition of this block, and believes it is important.

**2. Part 5 of the Proposed Form, Exemption Qualifications, 3<sup>rd</sup> Block.** The wording should be modified to clarify that a zero emissions facility, such as a wind energy facility, does not need to complete the Calculations Section that follows the Exemption Qualifications. Suggested language is:

\_\_\_\_\_ The Generating Facility, described in more detail in Part 3 of this Application, produces zero emissions during its operation. Calculation of generation efficiency below is not applicable.

3. **Part 5 of the Proposed Form, Calculations.** The wording of the first sentence under Calculations should be modified for the same reason cited in Comment 2 above. Suggested wording is:

**Completion of this section is required unless CARB Certification is included as part of this application, or the facility produces zero emissions.**

4. **Attachment 1 – Glossary.** The Glossary item “Exemption from CTCs” should remain, contrary to the suggestion of EPUC. This exemption is not included in the forms as it requires a facility test, but its inclusion should remain. If the Commission deems appropriate, a block might be provided indicating such qualification will be certified at a later date.

Oak Creek Energy appreciates the opportunity to provide these comments.

Respectfully Submitted,

---

Harold M. Romanowitz  
Oak Creek Energy Systems, Inc.  
14633 Willow Springs Road  
Mojave, CA 93501  
661-822-6853 voice  
661-822-5991 fax  
[hal@rwitz.net](mailto:hal@rwitz.net)

November 26, 2003